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VIA ECF

Honorable Thérèse Wiley Dancks
United States Magistrate Judge
United States District Court, Northern District of New York
Federal Building and U.S. Courthouse
P.O. Box 7346
Syracuse, NY 13261-7346

Re: *Reynolds v. The County of Onondaga et al*, No. 5:22-cv-01165-BKS-TWD

Dear Judge Dancks:

We represent Defendant NaphCare, Inc. (“NaphCare”) in the above-captioned matter, and write to respectfully request that the Court permit my remote appearance, as counsel of record for NaphCare, at the Rule 16 conference that is currently scheduled for February 21, 2023 at 1:00 p.m. ET (the “Conference”).

My colleagues Stephanie Olson and LaMarte Williams will be appearing at the Conference in-person on behalf of NaphCare, as they are currently in the Syracuse area taking a deposition of the New York State Commission of Correction in this matter. However, I am unable to attend the Conference due to a conflicting trip to Canada.

For these reasons, we respectfully request that the Court provide a telephonic dial-in, video link, or other method to permit me to appear, listen in, and participate in tomorrow’s Conference. We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ David A. Perez
David A. Perez

cc: All parties via ECF